

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA
Plaintiff

VS

MICHAEL DUNPHY
Defendant

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CRIMINAL DOCKET 4:24-CR-00543
HONORABLE KEITH P. ELLISON

AGREED MOTION TO AMEND CONDITIONS OF BOND

TO THE HONORABLE JUDGE KEITH P. ELLISON:

Michael Dunphy (Dunphy) files this motion to request permission to travel to the Eastern District of Texas for medical obligations and to visit close family members, and would show as follows:

BACKGROUND

Dunphy is charged by indictment with one count of conspiracy to engage in a pattern of racketeering activity and one count of assault in aid of racketeering activity. ECF No. 67. Dunphy was granted bond restricting his travel to the Southern District of Texas. ECF No. 165 (pg. 2). During the bond hearing, counsel was unaware that Dunphy lived close to the border of the Southern and Eastern Districts of Texas and that his doctors and certain close family members lived in the Eastern District of Texas. Dunphy has complied with all bond conditions and is in good standing with Probation.

REQUEST TO AMEND CONDITIONS OF BOND TO ALLOW APPROVED TRAVEL WITH TEXAS

Counsel has communicated with the Assistant United States Attorney and the Probation Department. Neither party opposes this motion. Therefore, Dunphy seeks to amend his bond conditions to allow travel within the Southern and Eastern Districts of Texas.

PRAYER

Dunphy prays this Court will grant his request and allow him to travel within the Southern and Eastern Districts of Texas.

Respectfully submitted,
FAZEL LAW

/s/ Ali R. Fazel
Ali R. Fazel
State Bar of Texas: 24012611
5373 West Alabama, Suite 600
Houston, Texas 77056
Telephone: (713) 526-6020
Ali@FazelLaw.com
Attorney for Defendant,
MICHAEL DUNPHY

CERTIFICATE OF CONFERENCE

The parties have discussed this motion and agree with the stated request.

Date: April 14, 2025

/s/ Ali R. Fazel
Ali R. Fazel

CERTIFICATE OF SERVICE

The following parties received service of this motion via ECF and electronic mail on April 14, 2025.

Byron H. Black

Assistant United States Attorney
Attorney's Office for the Southern District of Texas
1000 Louisiana Street, Suite 2300
Houston, Texas 77002
Phone: (713) 567-9432
Email: Byron.Black@usdoj.gov

/s/ Ali R. Fazel

Ali R. Fazel